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CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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*Representing the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

3:21-cr-00011-MMD-WGC

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN THOMAS ELEY,

Defendant.

CRIMINAL INDICTMENT

VIOLATIONS:

18 U.S.C. §§ 2252A(a)(2) and (b)(1) –  
Receipt of Child Pornography; and

18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2) –  
Possession of Child Pornography.

THE GRAND JURY CHARGES THAT:

COUNT ONE

Receipt of Child Pornography  
(18 U.S.C. §§ 2252A(a)(2), (b)(1))

1. Beginning on or about April 24, 2018, and continuing to on or about August 4, 2020, in the State and Federal District of Nevada,

RYAN THOMAS ELEY,

defendant herein, knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8), and material containing child pornography, that had been

1 mailed, shipped and transported in and affecting interstate and foreign commerce by a  
 2 means that included by computer, and that had been shipped and transported using a  
 3 means and facility of interstate and foreign commerce, in violation of Title 18, United  
 4 States Code, Sections 2252A(a)(2) and (b)(1).

5 COUNT TWO

6 Possession of Child Pornography  
 (18 U.S.C. §§ 2252A(a)(5)(B), (b)(2))

7 2. Beginning on or about April 24, 2018, and continuing to on or about August  
 8 4, 2020, in the State and Federal District of Nevada,

9 RYAN THOMAS ELEY,

10 defendant herein, knowingly possessed a book, magazine, periodical, film, videotape,  
 11 computer disk, and other material, namely a Kingston USB flash drive; Model Number  
 12 Kingston DataTraveler 112 USB Device; Serial Number 0xecc370067e05f, a SanDisk  
 13 Cruzer USB Device, a Seagate HDD external hard drive; Model Number ATA  
 14 ST500DM002-1BC14 USB Device; Serial Number W2A8PZM3, and an LG Stylo 5 cell  
 15 phone that contained an image of child pornography, as defined in Title 18, United States  
 16 Code, Section 2256(8), including but not limited to visual depictions of real minors,  
 17 prepubescent minors and minors who had not attained twelve years of age, engaged in  
 18 sexually explicit conduct, and that had been mailed, shipped and transported using a means  
 19 and facility of interstate and foreign commerce and in and affecting interstate and foreign  
 20 commerce by a means that included by computer, and that was produced using materials  
 21 that had been mailed, and shipped and transported in and affecting interstate and foreign  
 22 commerce by a means that included by computer, all in violation of Title 18, United States  
 23 Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

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FORFEITURE ALLEGATION

Receipt of Child Pornography and Possession of Child Pornography

1. The allegations contained in Counts One and Two of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253(a)(1) and 2253(a)(3).

2. Upon conviction of any of the felony offenses charged in Counts One and Two of this Criminal Indictment,

RYAN THOMAS ELEY,

defendant herein, shall forfeit to the United States of America, any visual depiction described in 18 U.S.C. § 2252A, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of 18 U.S.C. § 2252A(a)(2) and 2252A(a)(5)(B):

defendant herein, shall forfeit to the United States of America, any property, real or personal, used or intended to be used to commit or to promote the commission of 18 U.S.C. § 2252A(a)(2) and 2252A(a)(5)(B) or any property traceable to such property:

1. a Kingston USB flash drive, Model Number Kingston DataTraveler 112 USB Device; Serial Number 0xecc370067e05f;
2. a SanDisk Cruzer USB Device;
3. a Seagate HDD external hard drive, Model Number ATA ST500DM002-1BC14 USB Device, Serial Number W2A8PZM3; and
4. an LG Stylo 5 cell phone.

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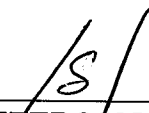
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1 All pursuant to 18 U.S.C. §§ 2252A(a)(2), 2252A(a)(5)(B), 2253(a)(1), and  
2 2253(a)(3).

3 DATED: this 25 day of March 2021.

4 A TRUE BILL:

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6 FOREPERSON OF THE GRAND JURY

7 CHRISTOPHER CHIOU  
8 Acting United States Attorney

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10 RANDOLPH J. ST. CLAIR  
11 Assistant United States Attorney  
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